

Richard M. Heimann (State Bar No. 63607)  
Kelly M. Dermody (State Bar No. 171716)  
Eric B. Fastiff (State Bar No. 182260)  
Brendan P. Glackin (State Bar No. 199643)  
Dean M. Harvey (State Bar No. 250298)  
Anne B. Shaver (State Bar No. 255928)  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, California 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008

Joseph R. Saveri (State Bar No. 130064)  
Lisa J. Leebove (State Bar No. 186705)  
James G. Dallal (State Bar No. 277826)  
JOSEPH SAVERI LAW FIRM  
505 Montgomery, Suite 625  
San Francisco, CA 94111  
Telephone: 415.500.6800  
Facsimile: 415.500.6803

*Interim Co-Lead Counsel for Plaintiffs and the Proposed Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' NOTICE OF REQUEST  
FOR IN CAMERA REVIEW**

THIS DOCUMENT RELATES TO:  
  
ALL ACTIONS

**TO THE COURT, PARTIES, AND ALL COUNSEL OF RECORD:**

Pursuant to the Court's February 28, 2013 Order re: Plaintiffs' Motion to Compel Production, Plaintiffs hereby provide notice to the Court and Google that Plaintiffs respectfully request an "in camera review of all of the documents Google seeks to withhold if Plaintiffs believe that the other communications are not privileged." (Dkt. 334 at 16.)

On February 25, 2013, Google produced, for the first time, a de-duplicated and consolidated privilege log, concerning documents Google produced through February 1, 2013. This log updates and consolidates the logs Plaintiffs previously provided the Court in connection with their Motion to Compel. Plaintiffs have attached to this Notice Google's updated log as Exhibit A. The log describes Google's redactions or withholding of its communications with Bill Campbell at his intuit.com email address, at the following log entries: 207, 223, 429-430, 509, 533, 540, 546, 554-555, 600, 679, 683-684, 686-688, 702, 739-740, 884, 1019, 1025-1027, 1029-1030, 1032-1034, 1042-1043, 1103, 1172-1173, 1260, 1464, 1557-1558, 1619, 1665, 1733, 1746, 1832, 1885, 1888, 1963, 1994-1995, 2000-2001, 2003, 2007, 2014, 2061, 2068, 2114, 2118, 2145, 2178, 2207, 2234, 2344- 2347, 2354-2355, 2400, 2410, 2448, 2471, 2528, 2638, 2645, 2647, 2677-2678, 2687-2688, 2719-2720, 2779-2781, 2792, 2808, 2831-2832, 2856-2857, 2952, 3105-3106, 3109-3112, 3125, 3152, 3155-3157, 3231, 3299, 3699, 4150, 4513, 4558, 4560, 4615, 4712, 6269, 6333, 6537, 7079-7080, 7128, 7150, 7166-7167, and 7194-7195. In all of these log numbers, either: (1) there were no attorneys on the communication whatsoever; or (2) an attorney was only copied on the communication.

Dated: March 4, 2013

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Dean M. Harvey  
Dean M. Harvey

Richard M. Heimann (State Bar No. 63607)  
Kelly M. Dermody (State Bar No. 171716)  
Eric B. Fastiff (State Bar No. 182260)  
Brendan P. Glackin (State Bar No. 199643)  
Dean M. Harvey (State Bar No. 250298)  
Anne B. Shaver (State Bar No. 255928)  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, California 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008

1 Joseph R. Saveri (State Bar No. 130064)  
2 Lisa J. Leebove (State Bar No. 186705)  
3 James G. Dallal (State Bar No. 277826)  
4 JOSEPH SAVERI LAW FIRM  
5 505 Montgomery, Suite 625  
6 San Francisco, CA 94111  
7 Telephone: 415.500.6800  
8 Facsimile: 415.500.6803

9  
10 *Interim Co-Lead Counsel for Plaintiffs and the Proposed*  
11 *Class*  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28